

FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

UNITED STATES OF AMERICA ex rel.  
CORI RIGSBY and KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE NO. 1:06cv433-LTS-RHW

STATE FARM FIRE AND CASUALTY COMPANY

DEFENDANT/COUNTER-PLAINTIFF

and

HAAG ENGINEERING CO.; and ALEXIS KING

DEFENDANTS

**STATE FARM'S UNOPPOSED  
LOCAL RULE 79 MOTION FOR LEAVE TO FILE UNDER SEAL  
ITS MOTION (WITH MEMORANDUM AND EXHIBITS)  
TO DECLASSIFY A PORTION OF CORI RIGSBY'S DEPOSITION  
FROM "PROTECTED INFORMATION" STATUS  
UNDER THE [406] CONSENT PROTECTIVE ORDER**

Defendant/Counter-Plaintiff State Farm Fire and Casualty Company ("State Farm") submits this Unopposed Local Rule 79 Motion for Leave to File Under Seal its Motion (With Memorandum and Exhibits) to Declassify a Portion of Cori Rigsby's Deposition From "Protected Information" Status Under the [406] Consent Protective Order. State Farm would show:

1. Prior to filing this motion, State Farm conferred on this matter with the Rigsbys and Haag. (Barbour Decl. at ¶6, Ex. A to Mtn.) Without prejudice to their respective positions either opposing or supporting State Farm's forthcoming Motion to Declassify, in whole or in part, the Rigsbys and Haag do not oppose the relief requested in this Motion, specifically; permission to file State Farm's forthcoming Motion to Declassify, all responses thereto, any rebuttals, exhibits, memoranda and associated materials under seal. (Good Faith Certif., Ex. B to Mtn.)
2. State Farm incorporates by reference its concomitant memorandum of authorities, including all evidence, argument and law contained therein.

WHEREFORE, PREMISES CONSIDERED, for the foregoing reasons, the Court should grant State Farm's motion and permit the applicable filers to file the following items under seal:

- (1) State Farm's Motion to Declassify a Portion of Cori Rigsby's Deposition From "Protected Information" Status Under the [406] Consent Protective Order, highlighted in yellow to identify the portions designated as Protected Information;
- (2) All responses thereto, including concomitant exhibits;
- (3) All response memoranda; and
- (4) Any rebuttal in support of State Farm's Motion, including any concomitant exhibits.

This the 28<sup>th</sup> day of October, 2010.

Respectfully submitted,

STATE FARM FIRE AND CASUALTY COMPANY

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**CERTIFICATE OF SERVICE**

I, Amanda B. Barbour, one of the attorneys for State Farm Fire and Casualty Company, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following, via the means directed by the Court's Electronic Filing System and as further described below:

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